

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KETYA BAXTER,

Plaintiff,

-against-

HF MANAGEMENT SERVICES, LLC a/k/a  
HEALTHFIRST and JOHN STAVLAS,

Defendants.

Case No. 1:24-cv-05762 (JPC)

**NOTICE OF REMOVAL OF  
CIVIL ACTION**

TO THE CLERK OF THE COURT:

**PLEASE TAKE NOTICE** that defendant HF Management Services, LLC, (“Defendant”), by and through its undersigned counsel, hereby gives notice of removal of the within action from the Supreme Court of the State of New York, New York County, where it was assigned Index No. 155827/2024, to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446.

In support of its Notice of Removal, Defendant respectfully alleges as follows:

1. On or about June 25, 2024, Plaintiff Ketya Baxter filed a summons and complaint entitled *Ketya Baxter v. HF Management Services LLC and John Stavlas* in the Supreme Court of the State of New York, New York County, Index No. 155827/2024 (the “State Court Action”).
2. Defendant agreed to accept service of the State Court Action effective July 25, 2024 and to respond to the complaint by September 20, 2024.
3. In accordance with the requirements of 28 U.S.C. § 1446, this Notice of Removal is timely.

4. See **Exhibit A** for a true and correct copy of all process, pleadings and orders that have been transmitted to Defendant in the State Court Action, pursuant to 28 U.S.C. § 1446(a).

5. Defendant seeks removal of the State Court Action to this Court on the ground that it is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331 and it is one which may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. §§ 1331, 1441(a), (b), (c), and 1446, in that it purports to state claims arising under federal law, specifically Title VII of the Civil Rights Act of 1964; the Civil Rights Act, 42 U.S.C. § 1981; the Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101; and the Family and Medical Leave Act, 28 USC § 2601, et seq.

6. This Notice of Removal is being filed in the United States District Court for the Southern District of New York, the district court of the United States for the district and division within which the State Court Action is pending, as required by 28 U.S.C. §§ 1441(a) and 1446(a).

7. No prior application has been made for this relief.

8. Defendant John Stavlas consents to the removal of this action.

9. Upon filing of this Notice of Removal, Defendant shall promptly give written notice thereof to Plaintiff's counsel of record, Goddard Law PLLC, and shall file copies of this Notice of Removal with the Clerk of the New York State Supreme Court for the County of New York, pursuant to 28 U.S.C. §1446(d).

10. By filing this Notice of Removal, Defendant does not waive any defenses available to it at law, in equity or otherwise.

WHEREFORE, Defendant prays that this civil action be removed from the Supreme Court of the State of New York, New York County, to this Court, the United States District Court for the

Southern District of New York, that this Court accept jurisdiction of this action henceforth, and that this action be placed on the docket of this Court for further proceedings as though the State Court Action had originally been instituted in this Court.

Dated: July 31, 2024  
Rye, New York

DORF NELSON & ZAUDERER, LLP

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